



5-408.62

1479

6-01526

MAY 23 10 25 AM '98

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: \_\_\_\_\_

MAY 28 1998

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Draft Final Sitewide  
Excavation Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Response to Comments (RTC) and revised Sitewide Excavation Plan (SEP).

Several meetings were held between representatives of U.S. EPA, U.S. DOE and the Ohio Environmental Protection Agency regarding the SEP and related soils excavation procedures and projects.

In general, the major issues identified by U.S. EPA in earlier comments of drafts of the SEP have been adequately addressed. However, additional clarification of several issues is necessary before the document can be approved.

Therefore, U.S. EPA disapproves draft final SEP pending incorporation of adequate responses to the attached comments into the document. U.S. DOE must submit a final SEP incorporating the RTC within thirty (30) days receipt of this letter. Many of these issues should be discussed at our June 8 and June 9 soils meeting.

sufficient monitoring has been conducted in deep excavations.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 3.3.3.2 and 3.3.3.3 Page #: 3-18 to 3-21 Line #: NA  
Original General Comment #: 5

Comment #: The text in these sections describe general strategies regarding the delineation of certification unit (CU) boundaries. Area 1, Phase I CUs underwent a series of revisions, or reconfigurations, after certification samples were collected. The text should be revised to clarify that CUs will not undergo reconfiguration following regulatory approval of the certification design letter and should describe steps that will be taken to prevent the need for CU reconfiguration.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 3.4.5 Page #: 3-27 Line #: 14  
Original Specific Comment #: 6

Comment: This paragraph is titled "widespread variability," although the introduction to the section (Line 4 on this page) and the text of the paragraph refer to "widespread contamination" instead. The paragraph title should be revised to be consistent with the introduction and text.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 4.1.3 Page #: 4-12 Line #: 3 and 4  
Original Specific Comment #: 7

Comment: The text states that high-purity germanium (HPGe) measurements will be used to certify the CU with respect to uranium and thorium FRLs. However, the regulatory agencies have not yet approved the use of in situ HPGe measurement for certification purposes. The text should be revised to clarify that analytical results from physical samples will be used to certify the CU for all CU-specific constituents of concern and that HPGe measurements will be collected for comparison purposes only.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 7.1.1 Page #: 7-2 Line #: NA  
Original Specific Comment #: 8

Comment: The section describes the general content of project-specific plans (PSP). Recent experience with PSPs at sites such as the South Field and Sewage Treatment Plant indicates that it is often necessary to collect more samples than originally planned to accomplish project objectives. DOE should consider adding a section to each PSP that includes procedures for amending the plan to define additional sampling locations if necessary. Additional sampling could then be completed without the delays related to preparing a new PSP. The SEP should be revised to discuss this issue.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: G.3.1

Page #: G-22

Line #: 22

Original Specific Comment #: 9

Comment: The text refers to Figure G-2 for area factors, but Figure G-2 is missing. In addition, line 14 on Page G-23 refers to Figure G-1 for an area versus risk plot. Figure G-1 is actually the flow diagram discussed in Section G.2.3 for selecting a statistical test. The cited area figures should be added and the figure citations corrected.